STATIONARY SOURCE PERMIT TO OPERATE

This permit includes designated equipment subject to New Source Performance Standards (NSPS).

This permit supersedes your permit dated January 11, 2008.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Packaging Corporation of America
2000 Jefferson Davis Highway
Richmond, Virginia 23224
Registration No.: 50085

is authorized to operate

a flexographic packaging printing facility

located at

2000 Jefferson Davis Highway
Richmond, Virginia 23224

in accordance with the Conditions of this permit.

Approved on **DRAFT.**

_____
James E. Kyle
Air Permit Manager

Permit consists of 13 pages.
Permit Conditions 1 to 48.

INTRODUCTION

This permit approval is based on the permit application dated September 29, 1997, including amendment information dated October 14, 1997, December 10, 1997, October 26, 1998, January 22, 1999, March 29, 2000, January 14, 2002, February 7, 2002, April 5, 2002, April 29, 2002, July 19, 2005, August 11, 2005, August 17, 2005, November 10, 2007, November 21, 2007, December 3, 2007, January 3, 2008, and January 14, 2008. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-10 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

PROCESS REQUIREMENTS

1. **Equipment List** - Equipment at this facility consists of the following:

Equipment to be Modified			
Reference No.	**Equipment Description**	**Rated Capacity**	**Federal Requirements**
Unit 1	York-Shipley FV-100-N/5 boiler	17.0 MMBtu/hr	NSPS, Subpart Dc

Equipment permitted prior to the date of this permit			
Reference No.	**Equipment Description**	**Rated Capacity**	**Federal Requirements**
Unit 2	Cleaver Brooks CBLE 200-500-250ST boiler	21.0 MMBtu/hr	NSPS, Subpart Dc
Unit 008	Langston 87" Corrugator	7.0 lbs/hour of resin and 217,500 ft^2	--
Unit 175	Universal 2-color 86" x 185" sheet-fed flexographic printing press	20 lbs ink/hr	--
Unit 270	Ward 2-color 66" x 113" sheet-fed flexographic printing press and rotary diecutter	20 lbs ink/hr	--
Unit 283	Staley 2-color 66" x 130" sheet-fed flexographic printing press and rotary diecutter	20 lbs ink/hr	--
Unit 310	Koppers 2-color 35" x 85" sheet-fed flexographic printing press and folder/gluer	20 lbs ink/hr 20 lbs adhesive/hr	--
Unit 316	S & S 2-color 38" x 98" sheet-fed flexographic printing press and folder/gluer	20 lbs ink/hr 25 lbs adhesive/hr	--
Unit 326	S & S 2-color 50" x 132" sheet-fed flexographic printing press and folder/gluer	20 lbs ink/hr 30 lbs adhesive/hr	--

Unit 432	J & L 64" x 115" folder/gluer	20 lbs adhesive/hr	--
Unit 435	Bahmuller Gluer/Stitcher an 100" x 187" folder/gluer	162.2 lbs adhesive/hr	--
Silo 01	Starch Storage Silo	56 ton	--
--	Parts Washer	15 gallon	--

(9 VAC 80-1180 D 3 and 9 VAC 5-80-850)

2. **Emission Controls** - Particulate emissions from the unloading of starch to the storage silo (Silo 01) shall be controlled by a baghouse with a minimum control of 99.0%. Regular inspections and maintenance shall be conducted on the fabric filter's bags by the permittee to insure proper working condition. The baghouse shall be provided with adequate access for inspection and shall be in operation when the silo is being loaded. Proper operation and maintenance procedure documentation shall be maintained at the facility.
(9 VAC 5-50-260)

3. **Emission Controls** - Reasonable precautions shall be taken to prevent fugitive emissions. Fugitive emission controls shall include the following, or equivalent, as a minimum:

   a. Particulate emissions from diecutter Unit No. 270 shall be controlled by a fabric filter vented into the interior of the building. The fabric filter and the particulate collection and exhaust ventilation ducting shall be provided with adequate access for inspection.

   b. Particulate emissions from diecutters Unit Nos. 283, 326, and 316 shall be controlled by a cyclone. The cyclone and the particulate collection and ventilation ducting shall be provided with adequate access for inspection

   (9 VAC 5-80-850)

4. **Emission Controls** - Unless otherwise specified in this permit, the Parts Washer shall meet all requirements listed in 9 VAC 5 Chapter 40 Part II Article 24, Emission Standards for Solvent Metal Cleaning Operations Using Non-halogenated Solvents (Rule 4-24).
(9 VAC 5-40-3260)

5. **Emission Controls** - The cold solvent cleaner(s) shall not use any cleaning solvents which contain methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination of these halogenated hazardous air pollutant solvents, in a total concentration that is greater than 5 percent, by weight.
(9 VAC 5-80-850 F)

6. **Emission Controls** - Volatile organic compound (VOC) emissions from all of the flexographic printing presses shall be controlled by use of waterborne inks and coatings. Waterborne inks and coatings are defined as inks and coatings whose volatile portion contains 75 percent or more by volume of water and 25 percent or less by volume of VOC, as applied to the substrate.
(9 VAC 5-80-1190 and 9VAC 5-80-870 A)

7. **Emission Controls** - Volatile organic compound (VOC) emissions from the gluing stations shall be controlled by the use of low solvent coatings as adhesive. Low solvent coatings are defined as coatings that contain not more than 0.5 pounds of VOC per pound of nonvolatile compounds.
(9 VAC 5-80-1190, 9 VAC 5-50-260, and 9 VAC 5-80-870 A)

8. **Emission Controls** - The waterborne inks and coatings applied at each of the two S & S flexographic presses, and the Koppers, Ward, Staley, and Universal flexographic presses (Unit Nos. 316, 326,

310, 270, 283, and 175 respectively) shall contain no more than 0.10 pounds of VOC per pound of ink or coating.
(9 VAC 5-80-1190 and 9 VAC 5-80-870 A)

9. **Emission Controls** - The adhesive coatings applied at each of the two S & S folder gluer stations, and the Koppers, Bahmuller, and J&L folder/gluer stations (Unit Nos. 316, 326, 310, 435, and 432 respectively) shall contain no more than 0.01 pounds of VOC per pound of adhesive.
(9 VAC 5-80-1190, 9 VAC 5-50-260, and 9 VAC 5-80-870 A)

10. **Emission Controls** - The inks and coatings applied at the presses and the gluing stations shall contain no more than a total of 0.02 pounds of hazardous air pollutants (HAPs) per pound of ink or coating.
(9 VAC 5-80-1190 and 9 VAC 5-80-870 A)

11. **VOC Work Practice Standards** – At all times the disposal of volatile organic compounds shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, or stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.
(9 VAC 5-80-850)

12. **Monitoring Devices** - The baghouse controlling the storage silo (Silo 01) shall be equipped with devices to continuously measure the differential pressure drop across the fabric filter. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the baghouse is operating. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times. An operating range shall be obtained/developed for the optimum operating conditions by the permittee and maintained at the facility.
(9 VAC 5-80-850)

OPERATING LIMITATIONS

13. **Throughput** - The throughput of starch to the starch storage silo (Silo 01) shall not exceed 1,200 tons (2,400,000 pounds) per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-1180 and 9 VAC 5-80-850)

14. **Throughput** - The throughput of inks and coatings applied at the two S & S flexographic presses, the Koppers, Ward, Staley, and Universal flexographic presses (Unit Nos. 316, 326, 310, 270, 283, and 175 respectively) shall not exceed 292.2 tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850 and 9 VAC 5-170-160)

15. **Throughput** - The throughput of adhesive coatings applied at the two S & S folder gluer stations, and the Koppers, Bahmuller, and J&L folder/gluer stations (Unit Nos. 316, 326, 310, 435, and 432 respectively) shall not exceed 91.0 tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by

adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850 and 9 VAC 5-170-160)

16. **Throughput** - The throughput of solvent to the 15 gallon Parts Cleaner shall not exceed 15 gallons per day. The throughput of solvent to the 15 gallon Parts Cleaner shall be no more than 385 gallons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850 and 9 VAC 5-170-160)

17. **Fuel** - The approved fuels for the boilers are distillate oil and natural gas. Distillate oil is defined as fuel oil that meets the specifications for fuel oil numbers 1 or 2 under the American Society for Testing and Materials, ASTM D396-97 "Standard Specification for Fuel Oils". A change in the fuels may require a permit to modify and operate.
(9 VAC 5-170-160)

18. **Fuel Throughput** - The York Shipley boiler shall consume no more than 148.9 million cubic feet of natural gas **or** 262.3 thousand gallons of #2 distillate oil per year, calculated monthly as the sum of each consecutive 12 month period. If a combination of the two fuels is used on the boiler, then the quantities of natural gas and #2 distillate oil, calculated monthly as the sum of each consecutive 12 month period, shall not exceed values that will allow the following equation to hold true:

$$(X) * (1{,}000\ \text{Btu/ft}^3) + (Y) * (140{,}000\ \text{Btu/gal}) <= 148{,}900\ \text{MMBtu/yr}$$

where X = Number of cubic feet of natural gas burned during any 12 consecutive month period
Y = Number of gallons of #2 distillate fuel oil burned during any 12 consecutive month period

(9 VAC 5-170-160)

19. **Fuel Throughput** - The Cleaver-Brooks boiler shall consume no more than 184.0 million cubic feet of natural gas **or** 324.0 thousand gallons of #2 distillate oil per year, calculated monthly as the sum of each consecutive 12 month period. If a combination of the two fuels is used on the boiler, then the quantities of natural gas and #2 distillate oil, calculated monthly as the sum of each consecutive 12 month period, shall not exceed values that will allow the following equation to hold true:

$$(X) * (1{,}000\ \text{Btu/ft}^3) + (Y) * (140{,}000\ \text{Btu/gal}) <= 184{,}000\ \text{MMBtu/yr}$$

where X = Number of cubic feet of natural gas burned during any 12 consecutive month period
Y = Number of gallons of #2 distillate fuel oil burned during any 12 consecutive month period

(9 VAC 5-170-160)

20. **Fuel** - The distillate oil shall meet the specifications below:

DISTILLATE OIL which meets the ASTM D396 specification for numbers 1 or 2 fuel oil:
Maximum sulfur content per shipment: 0.5%

(9 VAC 5-80-1180, 9 VAC 5-50-410 and 9 VAC 5-80-850)

21. **Fuel Certification** - The permittee shall obtain a certification from the fuel supplier with each shipment of distillate oil. Each fuel supplier certification shall include the following:

a. The name of the fuel supplier;

b. The date on which the distillate oil was received;

c. The quantity of distillate oil delivered in the shipment;

d. A statement that the distillate oil complies with the American Society for Testing and Materials specifications (ASTM D396) for numbers 1 or 2 fuel oil;

e. The sulfur content of the distillate oil.

Fuel sampling and analysis, independent of that used for certification, as may be periodically required or conducted by DEQ. Exceedance of these specifications may be considered credible evidence of the exceedance of emission limits.
(9 VAC 5-170-160 and 9 VAC 5-50-410)

22. **Operating and Training Procedures** - Emissions from the boilers shall be controlled by proper operation and maintenance. Boiler operators shall be trained in the proper operation of all such equipment. Training shall consist of a review and familiarization of the manufacturer's operating instructions, at minimum. The permittee shall maintain records of the required training including a statement of time, place and nature of training provided. The permittee shall have available good written operating procedures and a maintenance schedule for the boilers. These procedures shall be based on the manufacturer's recommendations, at minimum. All records required by this condition shall be kept on site and made available for inspection by the DEQ.
(9 VAC 5-80-1180 and 9 VAC 5-170-160)

23. **Testing** - The DEQ may require testing to determine if the ink or coating contents meet the requirements listed in Conditions 4, 5, 6, 7, 8, 9, and 12.
(9 VAC 5-170-160 and 9 VAC 5-50-30)

24. **Requirements by Reference** - Except where this permit is more restrictive than the applicable requirement, the NSPS equipment as described in Condition 1 shall be operated in compliance with the requirements of 40 CFR 60, Subpart Dc.
(9 VAC 5-80-1180, 9 VAC 5-50-400, and 9 VAC 5-50-410)

EMISSION LIMITS

25. **Process Emission Limits** - Emissions from the operation of the flexographic presses, two S & S, Koppers, Ward, Staley, and Universal flexographic presses (Unit Nos. 316, 326, 310, 270, 283, and 175 respectively) shall not exceed the limits specified below:

Volatile Organic Compounds	12.0	lbs/hr	29.2	tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 6, 8, 10, and 14.
(9 VAC 5-50-260 and 9 VAC 5-50-180)

26. **Process Emission Limits** - Emissions from the operation of the folder and gluers, two S & S folder gluer stations, and the Koppers, Bahmuller, and J&L folder/gluer stations (Unit Nos. 316, 326, 310, 435, and 432 respectively) shall not exceed the limits specified below:

Volatile Organic Compounds	2.6	lbs/hr	0.9	tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 7, 9, 10, and 15.
(9 VAC 5-50-260 and 9 VAC 5-50-180)

27. **Process Emission Limits** - Emission from the parts washer operations shall not exceed the limits specified below:

Volatile Organic Compounds	102.0	lbs/hr	1.3	tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 4, 5, and 16.
(9 VAC 5-50-260, 9 VAC 5-50-180, and 9 VAC 5-80-850)

28. **Process Emission Limits** - Emissions from the operation of the York Shipley boiler (Unit No. 1) shall not exceed the limits specified below:

Particulate Matter	0.2	lbs/hr	0.7	tons/yr
PM-10	0.1	lbs/hr	0.6	tons/yr
Sulfur Dioxide	8.6	lbs/hr	9.3	tons/yr
Nitrogen Oxides (as NO_2)	2.4	lbs/hr	8.2	tons/yr
Carbon Monoxide	1.4	lbs/hr	6.3	tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 17, 18, 20, and 22.
(9 VAC 5-80-850, 9 VAC 5-50-260, and 9 VAC 5-80-1180)

29. **Process Emission Limits** - Emissions from the operation of the Cleaver-Brooks boiler (Unit No. 2) shall not exceed the limits specified below:

Particulate Matter	0.5	lbs/hr	1.3	tons/yr
PM-10	0.5	lbs/hr	1.3	tons/yr
Sulfur Dioxide	10.7	lbs/hr	11.6	tons/yr
Nitrogen Oxides (as NO_2)	3.4	lbs/hr	10.6	tons/yr
Carbon Monoxide	2.3	lbs/hr	10.1	tons/yr
Volatile Organic Compounds	0.6	lbs/hr	1.8	tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of

emission limits. Compliance with these emission limits may be determined as stated in Conditions 17, 19, 20, and 22.
(9 VAC 5-80-850, 9 VAC 5-50-260, and 9 VAC 5-80-1180)

30. **Facility wide Emission Limits** - Total emissions from the flexographic packaging printing facility shall not exceed the limits specified below:

Particulate Matter	3.4	lbs/hr	2.0	tons/yr
PM-10	2.9	lbs/hr	2.0	tons/yr
Sulfur Dioxide	19.3	lbs/hr	20.9	tons/yr
Nitrogen Oxides (as NO_2)	5.8	lbs/hr	18.8	tons/yr
Carbon Monoxide	3.7	lbs/hr	16.4	tons/yr
Volatile Organic Compounds	117.5	lbs/hr	34.2	tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 2-24.
(9 VAC 5-50-260, 9 VAC 5-50-180, and 90 VAC 5-80-850)

31. **Emission Limit** - Emissions of hazardous air pollutants, as defined by Section 112 (b) of the Clean Act, shall be less than 10 tons per year of a single hazardous air pollutant, and less than 25 tons per year of any combination of hazardous air pollutants.
(9 VAC 5-80-850)

32. **Visible Emission Limit** - Visible emissions from the baghouse on starch storage silo (Silo 01) shall not exceed 5 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 10 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-50-260)

33. **Visible Emission Limit** - Visible emissions from the two S & S flexographic press/folder/gluers, the Koppers flexographic press/folder/gluer, the Ward and Staley flexographic presses, the J&L folder/gluer, and the Bahmuller folder/gluer (Unit Nos. 316, 326, 310, 270, 283, 432, and 435 respectively) shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-170-160 and 9 VAC 5-50-20)

34. **Visible Emission Limit** - Visible emissions from the York Shipley boiler (Unit No. 1) stack shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity. This condition applies at all times except during start-up, shutdown, or malfunction.
(9 VAC 5-80-1180, 9 VAC 5-50-80, and 9 VAC 5-80-850)

35. **Visible Emission Limit** - Visible emissions from the Cleaver-Brooks boiler (Unit No. 2) stack shall not exceed 10 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 20 percent opacity. This condition applies at all times except during start-up, shutdown, or malfunction.
(9 VAC 5-170-160 and 9 VAC 5-50-20)

36. **Visible Emission Limit** - Visible emissions from the Universal flexographic presses (Unit No. 175) stack shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity.
(9 VAC 5-170-160 and 9 VAC 5-40-80)

INITIAL COMPLIANCE DETERMINATION

37. **Stack Test -** Initial performance tests required under §60.8 shall be conducted for SO_2 (or weight percent sulfur) from the York Shipley boiler (Unit No. 1) to determine compliance with the emission standard contained in 40 CFR 60.42c(d). The tests shall be performed and demonstrate compliance within 60 days after achieving the maximum production rate at which the facility will be operated but in no event later than 180 days after start-up of the permitted facility. Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests are to be arranged with the Director, Piedmont Region. The permittee shall submit a test protocol at least 30 days prior to testing. One copy of the test results shall be submitted to the Director, Piedmont Region within 45 days after test completion and shall conform to the test report format enclosed with this permit.
(9 VAC 5-50-30, 9 VAC 5-80-1200, and 9 VAC 5-50-410)

RECORDS

38. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:

    a. Daily and annual consumption of natural gas and distillate oil for the York Shipley boiler (Unit No. 1), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

    b. Daily and annual consumption of natural gas and distillate oil for the Cleaver Brooks boiler (Unit No. 2), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

    c. Monthly records of the total amount of inks, total amount of coatings and total amount of adhesive (in tons) applied at the two S & S flexographic press/folder/gluers, the Koppers flexographic press/folder/gluer, and the Ward, Staley, Universal flexographic presses, the J & L folder/gluer, and the Bahmuller gluer/stitcher (Unit Nos. 316, 326, 310, 270, 283, 175, 435, and 432 respectively), and a monthly calculation of the sum of the total amount of inks, total amount of coatings, and total amount of adhesive (in tons) applied at each of the two S & S flexographic press/folder/gluers, the Koppers flexographic press/folder/gluer, and the Ward, Staley, and Universal flexographic presses, the J & L folder/gluer, and the Bahmuller gluer/stitcher (Unit Nos. 316, 326, 310, 270, 283, 175, 435, and 432 respectively), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

    d. Monthly records of the total amount of VOC applied at the two S & S flexographic press/folder/gluers, the Koppers flexographic press/folder/gluer, and the Ward, Staley, Universal flexographic presses, the J & L folder/gluer, and the Bahmuller gluer/stitcher (Unit Nos. 316, 326,

310, 270, 283, 175, 435, and 432 respectively), and the annual total amount of VOC applied at those lines, calculated monthly as the sum of VOC applied to each of those lines as the sum of each consecutive 12 month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

e. Annual throughout of starch to the storage silo (Silo 01), calculated monthly as the sum of each consecutive 12 month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

f. Records demonstrating that the VOC content, water content, nonvolatile content, and HAP content of each ink, coating, and adhesive coating used at the facility meet the requirements listed in Conditions 5, 6, 7, 8, and 9 of this permit.

g. Monthly records of the total HAPs emitted at the facility, and annual calculation of the total of all of the HAPs emitted at the facility, calculated monthly as the sum of each consecutive 12 month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

h. All fuel supplier certifications.

i. The maintenance records for the baghouse, including annual inspections of the baghouse, as well as maintenance and calibration of flow and differential pressure measurement device.

j. Log of pressure gauge readings required at least once per shipment of starch received containing the name of the operator reading the gauge, the date and time of the reading, and the reading.

k. Operation and maintenance procedures and optimum operating range for the baghouse, silo, and pressure gauge system.

l. Results of all stack tests, visible emission evaluations and performance evaluations.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-80-1180 and 9 VAC 5-50-50)

39. **Semi-Annual Reports** - The permittee shall submit fuel quality reports to the Director, Piedmont Region within 30 days after the end of each semi-annual period. If no shipments of distillate oil were received during the semi-annual period, the semi-annual report shall consist of the dates included in the semi-annual period and a statement that no oil was received during the semi-annual period. If distillate oil was received during the semi-annual period, the reports shall include:

a. Dates included in the semi-annual period;

b. A copy of all fuel supplier certifications for all shipments of distillate oil received during the semi-annual period or a semi-annual summary from each fuel supplier that includes the information specified in Condition 20 for each shipment of distillate oil; and

c. A signed statement from the owner or operator of the facility that the fuel supplier certifications or summaries of fuel supplier certifications represent all of the distillate oil burned or received at the facility.

One copy of the semi-annual report shall be submitted to the U.S. Environmental Protection Agency at the address specified below:

Associate Director
Office of Air Enforcement (3AP10)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-170-160 and 9 VAC 5-50-50)

40. **Emission Testing** - The facility shall be constructed/modified/installed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Sampling ports shall be provided when requested at the appropriate locations and safe sampling platforms and access shall be provided.
(9 VAC 5-80-880 and 9 VAC 5-80-850)

NOTIFICATIONS

41. **Initial Notifications** – The permittee shall furnish the following written notification to the Director, Piedmont Region:

a. The actual date on which modification of the York Shipley and Cleaver Brooks boilers (Unit Nos. 1 and 2) commenced within 30 days after such date.

b. The actual start-up date of the modified York Shipley and Cleaver Brooks boilers (Unit Nos. 1 and 2) within 15 days after such date.

c. The anticipated date of the stack test of the York Shipley and Cleaver Brooks boilers (Unit Nos. 1 and 2) postmarked at least 30 days prior to such date.

(9 VAC 5-50-50)

GENERAL CONDITIONS

42. **Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;

b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;

c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and

d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.
(9 VAC 5-170-130 and 9 VAC 5-80-850)

43. **Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Director, Piedmont Region of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone, or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Director, Piedmont Region in writing.
(9 VAC 5-20-180 C and 9 VAC 5-80-850)

44. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I and 9 VAC 5-80-850)

45. **Maintenance/Operating Procedures** – At all times, including periods of start-up, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

    The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:

    a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

    b. Maintain an inventory of spare parts.

    c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.

    d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

    Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
    (9 VAC 5-50-20 E and 9 VAC 5-80-850)

46. **Permit Suspension/Revocation** - This permit may be revoked if the permittee:

    a. Knowingly makes material misstatements in the permit application or any amendments to it;

    b. Fails to comply with the terms or conditions of this permit;

    c. Fails to comply with any emission standards applicable to a permitted emissions unit;

    d. Causes emissions from this facility which result in violations of, or interferes with the attainment and maintenance of, any ambient air quality standard;

e. Fails to operate this facility in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time that an application for this permit is submitted;

f. Fails to comply with the applicable provisions of Articles 6, 8 and 9 of 9 VAC 5 Chapter 80.
(9 VAC 5-80-1010)

47. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Director, Piedmont Region of the change of ownership within 30 days of the transfer.
(9 VAC 5-80-940)

48. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9 VAC 5-80-860 D)

SOURCE TESTING REPORT FORMAT

Report Cover

1. Plant name and location
2. Units tested at source (indicate Ref. No. used by source in permit or registration)
3. Test Dates.
4. Tester; name, address and report date

Certification

1. Signed by team leader/certified observer (include certification date)
2. Signed by responsible company official
3. *Signed by reviewer

Copy of approved test protocol

Summary

1. Reason for testing
2. Test dates
3. Identification of unit tested & the maximum rated capacity
4. *For each emission unit, a table showing:
    a. Operating rate
    b. Test Methods
    c. Pollutants tested
    d. Test results for each run and the run average
    e. Pollutant standard or limit
5. Summarized process and control equipment data for each run and the average, as required by the test protocol
6. A statement that test was conducted in accordance with the test protocol or identification & discussion of deviations, including the likely impact on results
7. Any other important information

Source Operation

1. Description of process and control devices
2. Process and control equipment flow diagram
3. Sampling port location and dimensioned cross section Attached protocol includes: sketch of stack (elevation view) showing sampling port locations, upstream and downstream flow disturbances and their distances from ports; and a sketch of stack (plan view) showing sampling ports, ducts entering the stack and stack diameter or dimensions

Test Results

1. Detailed test results for each run
2. *Sample calculations
3. *Description of collected samples, to include audits when applicable

Appendix

1. *Raw production data
2. *Raw field data
3. *Laboratory reports
4. *Chain of custody records for lab samples
5. *Calibration procedures and results
6. Project participants and titles
7. Observers' names (industry and agency)
8. Related correspondence
9. Standard procedures

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* Not applicable to visible emission evaluations